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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

Plaintiffs,

Civil No. 6:20-cv-01163-MK  
(Lead Case)

v.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE, SEAN  
SANBORN, ERIC SCHWENNINGER,  
RICHARD WALTER, CHRIS WEBLEY,  
ANTHONY WETMORE, KATHY WILCOX,  
CRAIG ZANNI, DAVID ZAVALA, JOEL D.  
SHAPIRO AS ADMINISTRATOR OF THE  
ESTATE OF DAVID E. HALL, VIDOCQ  
SOCIETY, CITY OF COQUILLE, CITY OF  
COOS BAY, and COOS COUNTY,

Defendants.

PLAINTIFFS' ANSWER TO  
DEFENDANT VIDOCQ'S  
COUNTERCLAIM

NICHOLAS JAMES MCGUFFIN, as an individual and as guardian *ad litem*, on behalf of S.M., a minor,

Plaintiffs,

Civil Case No. 3:21-cv-01719-MK  
(Trailing Case)

v.

OREGON STATE POLICE,

Defendant.

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COMES NOW Plaintiffs Nicholas James McGuffin and S.M., by and through their attorneys, Maloney Lauersdorf Reiner PC and Loevy & Loevy, and answer the counterclaim by Defendant Vidocq Society as follows:

### **I. ANSWER TO COUNTERCLAIM**

Defendant Vidocq Society filed a pleading titled, “Answer to Plaintiffs’ Second Amended Complaint, Affirmative Defenses and Cross-Claims, and Counterclaim.” [Dkt No. 154] Although the caption refers to a counterclaim, the text of the document does not allege a counterclaim. To the extent that Defendant Vidocq alleges a counterclaim, Plaintiffs deny.

### **II. PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully pray for the following relief:

1. Judgment against Defendant Vidocq Society and in favor of Plaintiffs on all counterclaims, if any; and
2. Such other relief as the Court finds just and equitable.

DATED: April 10, 2023

MALONEY LAUERSDORF REINER PC

By /s/Janis C. Puracal

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## CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2023, the foregoing PLAINTIFFS' ANSWER TO DEFENDANT VIDOCQ SOCIETY'S COUNTERCLAIM was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

<p>Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477 rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net <i>Attorneys for Defendants City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly McInnes</i></p>	<p>Jesse B. Davis Todd Marshall Oregon Department of Justice 100 SW Market Street Portland, OR 97201 todd.marshall@doj.state.or.us jesse.b.davis@doj.state.or.us <i>Attorneys for Defendants Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox</i></p>
<p>Anthony R. Scisciani III Kelsey L. Shewbert Meredith A. Sawyer HWS Law Group 101 SW Main Street, Suite 1605 Portland, OR 97204 ascisciani@hwslawgroup.com kshewbert@hwslawgroup.com msawyer@hwslawgroup.com <i>Attorneys for Defendant Vidocq Society</i></p>	<p>Eric S. DeFreest Luvaas Cobb 777 High Street, Ste. 300 Eugene, OR 97401 edefreest@luvaascobb.com <i>Attorneys for Defendant Richard Walter</i></p>

- ☒ by electronic means through the Court's ECF System on the date set forth above.
- ☐ by mailing a full, true and correct copy thereof in a sealed, first-class postage paid envelope, addressed to the attorneys as shown above, and deposited with the United States Postal Office at Portland, Oregon on the date set forth above.
- ☐ by emailing to each of the foregoing a copy thereof to the email address above.

MALONEY LAUERSDORF REINER PC

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